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March 6, 2014

Hon. Beth P. Gesner  
United States Magistrate Judge  
101 West Lombard Street  
Baltimore, Maryland 21201

RE: Linda Carter v. State of Maryland, *et al.*  
In the United States District Court for the District of Maryland  
Case No.: 1:12-CV-01789-BPG

Hon. Beth Gesner:

To date, the Defendants have failed to answer the Plaintiff's written discovery requests propounded on July 9, 2013 nor have they transmitted their FRCP Rule 26 disclosures. This is extremely problematic in light of the Plaintiff's previously filed Motion to Compel Defendants' Rule 26 Disclosures and Discovery Responses, Associated Sanctions, and to Extend the Discovery Deadline (denied by Your Honor on September 6, 2013 with instructions to jointly propose a revised Scheduling Order), the Plaintiff's follow-up letters and phone calls to the Defendants' attorneys, the Plaintiff's need to amend her Complaint to name the John and Jane Does as indicated to the Defendants' attorneys on numerous occasions, and her requests to depose the John and Jane Does.

In light of the above, the Plaintiff humbly requests an Order from Your Honor scheduling a conference to discuss the outstanding discovery requests and extending the discovery deadline, and the immediate transmission of the Incident Report in the Defendants' possession (previously referenced to the Plaintiff's attorneys by the Defendants' attorneys) and the names of the John and Jane Does so that the Plaintiff can amend her Complaint accordingly and schedule their depositions.

Respectfully Submitted,

**LAW OFFICE OF BARRY R. GLAZER, P.C.**

By: 

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